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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTOPHER ROBERTSON,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:21-cv-00928-NJK

**UNOPPOSED MOTION FOR EXTENSION OF
TIME**

(FIRST REQUEST)

1 Defendant, the Acting Commissioner of Social Security, through the undersigned counsel, hereby
2 requests a 14-day extension of time to respond to Plaintiff's Complaint, which is currently due on or before
3 July 1, 2022. The new proposed deadline is July 15, 2022.

4 This is Defendant's first request for an extension of time. Good cause exists for this extension
5 because in the course of reviewing the certified administrative record for completeness, the undersigned
6 attorney noticed an issue that she believes could necessitate remand. Defendant's counsel is in the
7 process of conferring with her client to determine whether this matter can be resolved by settlement. The
8 additional requested time will allow for settlement discussions with Plaintiff's counsel once the
9 undersigned has conferred with her client, and if the matter cannot be resolved, Defendant will file an
10 answer and the certified administrative record as soon as practicable. Defendant's counsel will endeavor
11 to complete these tasks as soon as possible. This request is made in good faith and with no intention to
12 unduly delay the proceedings, and counsel apologizes for any inconvenience.

13 On June 23, 2022, the undersigned conferred with Plaintiff's counsel, who has no opposition to the
14 requested extension.

15 It is therefore respectfully requested that Defendant be granted a 14-day extension of time to file a
16 response to Plaintiff's Complaint, through and including July 15, 2022.

17
18 Dated: June 24, 2022

19 JASON M. FRIERSON
United States Attorney

20 /s/ Allison J. Cheung
21 ALLISON J. CHEUNG
Special Assistant United States Attorney

22
23 IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: June 24, 2022